

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant,

v.

ANDREW H. GIULIANI,

Intervenor-Defendant.

No. 24-mc-353 (LJL)

**PLAINTIFFS' AMENDED PRETRIAL DISCLOSURES REGARDING CLAIMS  
ASSERTED BY INTERVENOR-DEFENDANT ANDREW H. GIULIANI**

Plaintiffs Ruby Freeman and Wandrea' ArShaye Moss ("Plaintiffs") provide the following amended disclosures pursuant to Federal Rules of Civil Procedure Rule 26(a)(3) limited to the claims asserted by Intervenor-Defendant Andrew H. Giuliani, which are scheduled to be heard on January 16, 2025. Plaintiffs reserve the right to supplement these disclosures.

**I. Trial Witnesses**

Plaintiffs may call the following witnesses at trial:

<b>Witness Name</b>	<b>Address and Telephone</b>	<b>Will Call/May Call</b>
Rudolph W. Giuliani	c/o Joseph M. Cammarata, Esq. Cammarata & De Meyer, P.C. 456 Arlene Street Staten Island, New York 10314 (718) 477-0020	Will call

## **II. Deposition Designations**

To date, Plaintiffs have deposed Mr. Andrew Giuliani. The deposition of Mr. Rudolph Giuliani is scheduled for December 27, 2024. The deposition of Mr. Sean Kalin is to be scheduled. Plaintiffs will provide any deposition designations they intend to use at trial following the completion of all depositions.

## **III. Plaintiffs' Trial Exhibits**

The documents Plaintiffs expect to offer at trial are attached hereto as Exhibit A.

Dated: December 23, 2024

**WILLKIE FARR & GALLAGHER LLP**

/s/ Aaron E. Nathan

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*Attorneys for Plaintiffs Ruby Freeman and  
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**EXHIBIT A**

<b>Exhibit Number</b>	<b>Description</b>	<b>Will/May Offer</b>
PTX-001	Photograph of New York Yankees World Series Ring (On Hand)	May Offer
PTX-002	Photograph of Side Profile of New York Yankees World Series Ring (On Hand)	May Offer
PTX-003	2007.05.01 – Wayne Barrett, <i>The Yankees's Clean-Up Man</i> , The Village Voice (May 1, 2007)	May Offer
PTX-004	2007.05.12 – Jim Dwyer, <i>The Rings of Giuliani</i> , New York Times (May 12, 2007)	May Offer
PTX-005	2018.04.26 – Photograph of Andrew Giuliani, Rudolph W. Giuliani and Unidentified Female with New York Yankees World Series Rings	May Offer
PTX-006	2018.04.26 – Photograph of Andrew Giuliani, Rudolph W. Giuliani and Unidentified Female with New York Yankees World Series Rings	May Offer
PTX-007	2018.12.16 – Alan Smith, <i>Rudy claims Michael Cohen hush payments, possible Russia collusion 'not a crime'</i> , NBC News (December 16, 2018)	May Offer
PTX-008	2024.01.26 – Text Messages between Andrew Giuliani and Gary F.	May Offer
PTX-009	2024.01.26 – Text Messages between Andrew Giuliani and Gary F.	May Offer
PTX-010	2024.01.26 – Affidavit of Rudolph W. Giuliani Pursuant to Local Rule 1007-1(B) attaching Schedule A/B (Property) and Schedule C (The Property You Claim as Exempt), <i>In re Giuliani</i> (No. 23-12055-shl Bankr. S.D.N.Y.)	May Offer
PTX-011	2024.02.27 – Schedule A/B (Property) and Schedule G (Executory Contracts and Unexpired Leases), <i>In re Giuliani</i> (No. 23-12055-shl Bankr. S.D.N.Y.)	May Offer
PTX-012	2024.05.25 – Delta Airlines Flight Receipt for Andrew Giuliani dated May 25, 2024	May Offer
PTX-013	2024.10.08 – Memorandum of Law in Support of Andrew H. Giuliani's Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer

Exhibit Number	Description	Will/May Offer
PTX-014	2024.10.08 – Declaration of Scott B. McBride in Support of Andrew H. Giuliani's Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer
PTX-015	2024.10.08 – Declaration of Andrew H. Giuliani in Support of His Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer
PTX-016	2024.10.08 – Exhibit A to Declaration of Andrew H. Giuliani in Support of His Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer
PTX-017	2024.10.27 – Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs First set of Document Requests, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer
PTX-018	2024.10.27 – Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs First Set of Interrogatories, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer
PTX-019	2024.10.27 – Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs' Information Subpoena with Restraining Notice Pursuant to C.P.L.R. §§ 5222 and 5224, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	May Offer
PTX-020	2018.06.08 – Photograph of New York Yankees World Series Ring (On Hand)	May Offer
PTX-021	2019.10.04 – Rudolph W. Giuliani X Post with Photograph of Rudolph W. Giuliani and Unidentified Man with New York Yankees World Series Ring (On Hand)	May Offer
PTX-022	2020.07.01 – Photograph of New York Yankees World Series Ring (On Hand)	May Offer
PTX-023	2022.06.07 – Photograph of Rudolph W. Giuliani and Andrew Giuliani with Side Profile of New York Yankees World Series Ring (On Hand)	May Offer
PTX-024	2022.06.07 – Photograph of New York Yankees World Series Ring (On Hand)	May Offer
PTX-025	2022.06.24 – Bill Mahoney, <i>Rudy Giuliani's Pitch to New York: Hire My Son</i> , Politico	May Offer
PTX-026	2022.10.15 – Rudolph W. Giuliani X Post with Photograph of New York Yankees World Series Ring (On Hand)	May Offer

Exhibit Number	Description	Will/May Offer
PTX-027	2024.10.09 – Chris Malone Méndez, <i>Yankees World Series Rings Embroided in Rudy Giuliani Defamation Lawsuit</i> , Men’s Journal, with Photograph of New York Yankees World Series Ring (On Hand)	May Offer
PTX-028	2018.06.05 – Eli Watkins, <i>Giuliani Predicts His Work for Trump will not Harm his Legacy</i> , CNN, with Photograph of New York Yankees World Series Ring (On Hand)	May Offer
PTX-029	Rudolph W. Giuliani 2018 Tax Return	May Offer
PTX-030	Rudolph W. Giuliani 2021 Tax Return	May Offer
PTX-031	Rudolph W. Giuliani 2022 Tax Return	May Offer
PTX-032	Rudolph W. Giuliani 2023 Tax Return (Unsigned)	May Offer